



Chris Cummings  
Principal Project Manager – Development Management  
City Development  
Exeter City Council  
Civic Centre  
Paris Street  
Exeter  
EX1 1JN

Your Ref:  
Our Ref: 0156/04/230925

25 September 2023

Dear Chris,

**Southgate, Exeter**

**Proposed Highways Works and Development of up to 200 New Homes**

**Request for Environmental Impact Assessment Screening Opinion**

We are writing on behalf of our client, Exeter City Council in its capacity as developer of the Southgate site, to request an Environmental Impact Assessment (EIA) Screening Opinion from the Local Planning Authority under Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

It is not unusual for Councils to act as project developers and as Local Planning Authority, and in such cases there is always a clear separation between the Council personnel acting in the respective functions to ensure objectivity on the part of the Local Planning Authority. That is the case for this project. We are sure you are aware of them, but nevertheless remind you of the obligations that exist in this regard in Regulation 64 of the EIA Regulations:

*“Objectivity and bias*

*64. —(1) Where an authority or the Secretary of State has a duty under these Regulations, they must perform that duty in an objective manner and so as not to find themselves in a situation giving rise to a conflict of interest.*

*(2) Where an authority, or the Secretary of State, is bringing forward a proposal for development and that authority or the Secretary of State, as appropriate, will also be*

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*responsible for determining its own proposal, the relevant authority or the Secretary of State must make appropriate administrative arrangements to ensure that there is a functional separation, when performing any duty under these Regulations, between the persons bringing forward a proposal for development and the persons responsible for determining that proposal.”*

Please refer to the enclosed Location Plan, reference SGT-AHR-XX-00-DR-A-06100-P2. The site comprises land known as Southgate, Exeter. The intended planning application site boundary is outlined by a solid red line (measuring approximately 1.5 hectares), and the area within which residential-led development is proposed (measuring approximately 0.7 hectares) is outlined by a dashed red line.

A hybrid planning application is intended to be submitted in February 2024, with the highways works being subject to the full/detailed element of the planning application and the residential development being subject to the outline element of the application.

The applicant currently envisages residential development of approximately 172 dwellings, but for the purposes of this EIA Screening Opinion request we assume up to 200 dwellings to provide some tolerance as the design emerges. Tall buildings are envisaged in order to achieve the anticipated number of dwellings within the confines of the site.

To assist in your deliberations we enclose an EIA Screening Report which describes the site and surroundings and their environmental characteristics, describes the proposed development such as it can be at this stage, and analyses the proposed development in the context of the sequential questions required for EIA Screening under the EIA Regulations. Our conclusion is that the proposed development is not likely to have significant effects on the environment, so is not ‘EIA development’ as defined in the EIA Regulations 2017, and an Environmental Statement is not required to accompany a planning application.

We look forward to the Local Planning Authority’s EIA Screening Opinion within the statutory three-week time period, i.e. by 16 October 2023.

Yours sincerely,

**Ian Roach** MRTPI MIEMA CEnv  
Director

CC

- Rachel Papworth, J Price Consulting Limited, for Exeter City Council as developer

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Enclosures:

- SGT-AHR-XX-00-DR-A-06100-P2 Location Plan
- EIA Screening Report

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